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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

**THE OBJECTION SERVED WITH THIS
NOTICE ASKS THE COURT TO
DISALLOW AND EXPUNGE CERTAIN
CLAIMS IDENTIFIED ON EXHIBIT 1
ATTACHED TO THE OBJECTION.**

**CLAIMANTS RECEIVING THIS NOTICE
AND THE ACCOMPANYING OBJECTION
SHOULD LOCATE THEIR NAMES AND
CLAIMS ON EXHIBIT 1 TO THE
OBJECTION, AND READ THIS NOTICE
AND THE OBJECTION CAREFULLY
BECAUSE THE OBJECTION MAY
AFFECT YOUR RIGHT TO RECEIVE A
DISTRIBUTION ON YOUR CLAIM IN
THIS CASE.**

**IF YOU HAVE QUESTIONS, PLEASE
CONTACT PRIME CLERK, LLC,
AT (844) 339-4217**

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF SECOND OMNIBUS OBJECTION
TO CLAIMS AND OF HEARING ON OMNIBUS
OBJECTION (Duplicative, Amended and Wrong
Case Claims)**

Hearing:

Date: June 24, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: June 12, 2020, 4:00 p.m. (PT)

TO ALL CLAIMANTS LISTED ON EXHIBIT 1 TO THE OMNIBUS OBJECTION THAT IS BEING SERVED ON YOU WITH THIS NOTICE, PLEASE TAKE NOTICE THAT:

On May 22, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed their *Second Omnibus Objection to Claims (Duplicative, Amended and Wrong Case Claims)* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”). A copy of the Omnibus Objection accompanies this Notice.

By the Omnibus Objection, the Debtors seek to disallow and expunge one or more of your Proof(s) of Claim (as defined therein), specifically as listed in the column headed “Claims to be Disallowed and Expunged” in Exhibit 1 to the Omnibus Objection (the “Objected-To Claim”). The objection is made on the ground that the Objected-To Claim is duplicative of another Proof of Claim (the “Surviving Claim”), identified as such in the column headed “Surviving Claims” in Exhibit 1. The objection is brought to prevent claimants from receiving improper double recovery. Exhibit 1 lists, in alphabetical order by claimant’s name, each Proof of Claim that is the subject of this Omnibus Objection, together with a short explanation of the basis for objection to the Objected-To Claim, using one of three legends in the column headed “Basis for Objection”:

- “**Amended & Replaced Claims**” means the Objected-To Claim was superseded by a subsequently filed proof of claim that expresses that intention on the face of or in the attachments to the later-filed Proof of Claim;
- “**Duplicative**” means that, after the Objected-To Claim was filed, the Surviving Claim was filed against the same Debtor on account of the same obligation, but the Surviving Claim does not express an intention to amend and supersede the Objected-To Proof of Claim; and
- “**Wrong Case**” means that the Objected-To Claim was filed against the wrong Debtor, while the Surviving Claim was filed against the correct Debtor.

Any Proof of Claim that the Bankruptcy Court disallows will be treated as if it had not been filed and you will not be entitled to any distribution on account of the disallowed claim. Such disallowance will not prevent you from recovering on your Surviving Claim. Based on the current state of their review of claims, the Debtors do not currently expect to assert other grounds for objection to your Surviving Claim, but they reserve the right to do so in the future. The Debtors also reserve the right to object on other grounds to any Objected-To Claim that is not disallowed as requested in the Omnibus Objection.

The Bankruptcy Court will hold a hearing on **June 24, 2020, at 10:00 a.m. (Pacific Time)** (the “**Hearing**”) before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020, **the Hearing will be conducted telephonically. The courtroom will be closed.** All parties who wish to appear at the Hearing must make arrangements to appear telephonically with CourtCall at 1-866-582-6878 no later than 4:00 p.m. (Pacific Time) on the day before the Hearing. Further information regarding telephonic appearances via CourtCall can be found on the Bankruptcy Court’s website, at the following location: www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone. Charges have been waived by CourtCall for pro se parties.

If you do **NOT** oppose the disallowance of your Objected-To Claim(s) as identified on Exhibit 1, then you do NOT need to file a written response to this Omnibus Objection and you do NOT need to appear at the Hearing.

If you **DO** oppose the disallowance or reduction of your Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in writing, with the Bankruptcy Court, and serve it on the counsel for the Debtors at the above addresses so as to be received by no later than **4:00 p.m. (Pacific Time) on June 12, 2020**. Any oppositions or responses must be filed and served on all “Standard Parties” as defined in, and in accordance with, the *Second Amended Order Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (the “**Case Management Order**”). **The relief requested in the Omnibus Objection may be granted without a hearing as to any Objected-To Claim if no opposition regarding that Claim is timely filed and served in accordance with the Case Management Order.**

The Response should include the following:

- (i) a caption setting forth the name of the Bankruptcy Court, the name of the Debtor, the case number and title of the Omnibus Objection to which the Response is directed;
- (ii) your name, the assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of Claim;
- (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain the Omnibus Objection, including, without limitation, the specific factual and legal bases upon which you will reply in opposing the Omnibus Objection;
- (iv) a copy of any other documentation or other evidence of the Proof of Claim, to the extent not already included with the Proof of Claim, upon which you will rely in opposing the Omnibus Objection at the hearing;
- (v) a declaration under penalty of perjury of a person with personal knowledge of the relevant facts that support the Response;
- (vi) your name, address, telephone number, and/or the name, address, and telephone number of your attorney and/or designated representative to whom counsel for the Debtors should serve a reply to the Response, if any; and
- (vii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on your behalf, if any.

If the Bankruptcy Court does not disallow or reduce your Proof(s) of Claim listed above, then the Debtors have the right to object on other grounds to your Proof(s) of Claim at a later date. You will receive a separate notice of any such objection.

Copies of the any other pleadings and documents identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account required], (ii) for free by download from on the Debtors’ approved notice and claim agent’s website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free, by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com.

Dated: May 22, 2020

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

By: /s/ Peter J. Benvenutti
Peter J. Benvenutti

*Attorneys for Debtors
and Debtors in Possession*